

ID: 54

Exception: Lack of adherence to Established "Hot Cut" Procedures

Domain: POP

Owner: Rob McDonald/Steve Sesko

Date Uncovered: 3/15/99

Description: An exception has been identified as a result of the ongoing POP CLEC testing process. The following exception describes a failure by Bell Atlantic-New York to consistently follow the established "Hot Cut" coordination procedures as outlined in the the Regional CLEC Coordination Center's (RCCC) "RCCC Two Wire Analog Loop -RCCC North" document. Through their failure to follow established procedures, RCCC coordinators also allow irregularities to occur at the Recent Change Memory Administration Center (RCMAC) and various BA-NY Central Offices (CO).

CLECs order UNE Loops with Local Number Portability (LNP) as a coordinated "Hot Cut" to meet two primary customer needs:

1. Seamlessly transition of their customer to a new local exchange carrier without significant outage of telephone service
2. Allowing the customer to retain his/her original telephone number

When working on UNE Loop LNP Hot Cut Orders, the RCCC coordinates a series of tasks performed at the Frame Due Time (FDT) by the BA-NY Recent Change Memory Administration Center (RCMAC), the BA-NY Frame Technician(s), and the CLEC. The RCMAC performs translation updates to the BA-NY switch which disconnect dial-tone to the subscribers loop. The BA-NY Frame Technician removes BA-NY's switch cross-connections from the subscriber's loop and connects the CLEC's switch cross- connections to the subscriber's loop. The CLEC then provides dial-tone to the subscriber's loop. The Hot Cut process should be coordinated to ensure that the transfer of service occurs at the designated FDT and that any service disruption to the subscriber is minimized.

At FDT, safeguards are designed into the process to prevent subscribers from being put out of service as a result of the Hot Cut process. Through observation, KPMG has identified a number of problems associated with the UNE Loop LNP Hot Cut orders at various provisioning work centers and with communication between BA-NY and CLECs. These problems indicate that the process is not well coordinated by the RCCC. These UNE Loop LNP Hot Cut problems include:

- RCCC Coordinators placed the required coordination phone calls to the KPMG “pseudo” CLEC on only just over half of the test transaction orders entered by KPMG and received by BA-NY.
- Frame Technicians removed BA-NY switch cross-connects and replaced them with CLEC switch cross connects before FDT (early cut).
- Frame Technicians removed BA-NY switch cross-connects and replaced them with CLEC switch cross connects after FDT (late cut).
- Frame Technicians removed BA-NY switch cross-connects and replaced them with CLEC switch cross connects at the FDT of an order that had been superseded with a supplemented order specifying a new FDT.
- Frame Technicians removed BA-NY switch cross-connects and replaced with CLEC switch cross connects at the FDT of an order that had been cancelled.
- RCMAC switch administrator removed switch translations at FDT of an order that had been superseded with a supplemented order specifying a new FDT.
- RCMAC switch administrator removed switch translations at FDT of an order that had been cancelled.
- Upon completion of cut-over, acknowledgement by CLEC accepting orders through RCCC was not received.
- Directory Listings dropped for post-migrated orders.

Additionally, KPMG observed specific failures to adhere to established methods and procedures at various BA-NY COs unrelated to the coordination provided by RCCC coordinators. The Frame Technician located at the CO is required to follow an established process when working on a UNE Loop LNP Hot Cut Order at the BA-NY Wire Center. The following problems were identified:

- Testing for dial tone on CLEC switch appearance at Main Distribution Frame (MDF) prior to cut-over of customer's loop was not performed.
- Pre-wiring of new frame jumpers was not "tagged" prior to migration of customer's loop.
- Initial testing for dial tone occurred at Frame Due Time (FDT) instead of 24 - 48 hours earlier.
- Testing for Automatic Number Identification (ANI) on existing BA-NY Office Equipment (OE) at FDT was not performed.
- Conducted cut-overs at time other than scheduled FDT.
- Post cut-over testing for dial tone was not performed.
- Post cut-over testing for ANI was not performed.
- Service Interruptions of less than five (5) minutes was not met.
- Upon completion of cut-over, acknowledgement of customer acceptance through RCCC was not received.
- For cancelled orders, failure of BA-NY systems to notify Frame Technician that orders had been cancelled which led to the Frame Technician conducting

customer disconnect order.

- For supplemented orders specifying a delayed cut-over, failure of BA-NY systems to notify Frame Technician that order had been delayed leading to Frame Technician processing customer disconnect order at time specified on original order.

Impact Assessment: CLEC customers undergoing the UNE Loop with LNP Hot Cut Process are vulnerable to any number of service affecting disruptions. BA-NY's UNE Loop with LNP Hot Cut Processes are designed to minimize service affecting problems in the customer's service at the time of cut-over and to verify that a customer's service has been successfully migrated to the CLEC following the cut-over. Failure of the RCCC to ensure strict coordination between all affected parties at the FDT increases the chances that a given subscriber will experience a service disruption. Moreover, failure of BA-NY Frame Technicians to follow established Hot Cut procedures also increases the chances that a given subscriber will experience a service disruption.

Status: Open

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4/7/99 (Revised)